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5 Plaintiff in pro per

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

3 | EDWIN HAMID NAHAVANDI

Case No. 2:24-cv-03791-RGK(EX)

Plaintiff(s),

5 || VS.

**SUPPLEMENTAL MEMORANDUM
IN SUPPORT OF LOCAL RULE 37
JOINT STIPULATION**

6 BOARD OF TRUSTEES OF THE
7 CALIFORNIA STATE UNIVERSITY
8 (the State of California acting in its higher
9 education capacity); ERIKA DREW
10 BECK, in her official capacity as President
11 of California State University, Northridge; ZEINA OTAKY RAMIREZ, in her
12 official capacity as Director of Student
13 Conduct and Ethical Development at
14 California State University, Northridge;
15 WILLIAM WATKINS, in his official
16 capacity as Vice President of Student
17 Affairs at California State University,
18 Northridge

Defendant(s).

INTRODUCTION

1. This supplemental memorandum, pursuant to Local Rule 37.2.3, serves as a true declaration under penalty of perjury signed by Plaintiff Edwin Hamid Nahavandi, towards the events which took place in the United States Department of Justice Federal building.

2. Video and audio surveillance cameras in the United States Department of Justice Federal building can further confirm Plaintiffs statements.

3. Plaintiff requests that this Court obtain and review the video and audio footage by subpoenaing the Department of Justice to verify Plaintiff's serious claims.

STATEMENT OF FACTS

4. The video and audio camera footage in the Department of Justice Federal building can confirm that counsel Cristina Matsushima had:

5. Told Plaintiff that the Judge has agreed to dismiss Plaintiff's case before the submission of their Motion for Discovery Sanctions and fine him, telling Plaintiff that he is a stupid kid for believing that this Court will give him a trial and that Plaintiff is too stupid to understand how the world works, or he would understand why this happened to him;

6. Specified to Plaintiff that in the beginning before drafting the Motion for Discovery Sanctions that Judge Charles has agreed with the Department of Justice to dismiss Plaintiff's claims and fine the Plaintiff after the filing of their Motion for Sanctions;

7. Told Plaintiff that the Department of Justice would delete and remove all the video and audio surveillance tapes of their conversations, deny all of Plaintiff's claims, and bring witnesses to support her alibi.

RELIEF SOUGHT

8. Give Plaintiff the video and audio surveillance tapes of the United States Department of Justice Federal building, for proof of evidence in the anticipation of future litigation.

9. Order the Department of Justice to preserve and maintain their video and audio surveillance tapes, for proof of evidence in the anticipation of future litigation.

DATED: 2/28/25

Signature: Edwih Nahavahdi

Plaintiff in Pro Per